

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

**14-CR-164-WMS**

v.

**NOTICE OF MOTION**

ARI ELIAS BAUM,

Defendant.

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**MOTION BY:**

Brian P. Comerford, Assistant Federal Public  
Defender.

**DATE, TIME & PLACE:**

Before the Honorable Jeremiah J. McCarthy,  
United States Magistrate Judge, Robert H. Jackson  
United States Courthouse, 2 Niagara Square,  
Buffalo, New York, **on the papers.**

**SUPPORTING PAPERS:**

Affirmation of Brian P. Comerford, dated  
January 25, 2016.

**RELIEF REQUESTED:**

Permission to travel outside the Western District of  
New York to Syracuse, New York.

**DATED:**

Buffalo, New York, January 25, 2016.

/s/ **Brian P. Comerford**

Brian P. Comerford  
Assistant Federal Public Defender  
Federal Public Defender's Office  
300 Pearl Street, Suite 200  
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(716) 551-3341, (716) 551-3346 (Fax)  
[brian\\_comerford@fd.org](mailto:brian_comerford@fd.org)  
*Attorney for Defendant Ari Elias Baum*

**TO:** Frank T. Pimentel  
Assistant United States Attorney

Jaclyn S. Sainsbury  
United States Probation Officer

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

**14-CR-164-WMS**

v.

**AFFIRMATION**

ARI ELIAS BAUM,

Defendant.

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**BRIAN P. COMERFORD**, affirms under penalty of perjury that:

1. I represent the defendant, Ari Baum.
2. Mr. Baum is presently on pretrial release, his travel is restricted to the Western District of New York. Mr. Baum and his father have asked for permission for Ari to travel to Syracuse, New York for one day to pick up property belonging to Mr. Baum's sister, and then transport the property back to Buffalo. This property is presently located at Syracuse University. I have spoken with Mr. Baum's father, and he has stated that they would like Ari to drive out, pick up the property, and return on the same day.
3. We respectfully request that the Court permit Mr. Baum to travel to Syracuse, New York, on a date and time approved by Probation.
4. I have discussed this request with United States Probation Officer Jaclyn Sainsbury and she has indicated that Probation has no objection.

5. I have discussed this request with Assistant United States Attorney Frank Pimentel and he has indicated that the Government has no objection.

**DATED:** Buffalo, New York, January 25, 2016.

Respectfully submitted,

**/s/ Brian P. Comerford**

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*Attorney for Defendant Ari Elias Baum*

**TO:** Frank T. Pimentel  
Assistant United States Attorney

Jaclyn S. Sainsbury  
United States Probation Officer